

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, ET AL.,
Plaintiffs,
v.
AMERICAN AIRLINES GROUP INC. and
JETBLUE AIRWAYS CORPORATION,
Defendants.

Civil Action No. 1:21-cv-11558-LTS

**AMERICAN AIRLINES GROUP INC. AND JETBLUE AIRWAYS CORPORATION'S
UNOPPOSED MOTION FOR EXPEDITED BRIEFING AND CONSIDERATION OF
MOTION TO COMPEL ATTENDANCE OF DELTA EXECUTIVES AT TRIAL**

Defendants American Airlines Group Inc. (“American”) and JetBlue Airways Corporation (collectively with American, “Defendants”) respectfully move this Court for an expedited briefing schedule with respect to American and JetBlue’s Motion to Compel Attendance of Delta Executives at Trial (“Motion”) (ECF No. 175). The Motion seeks to compel the attendance and testimony of Joseph Esposito and Glen Hauenstein—two high-ranking executives of Delta Air Lines, Inc. (“Delta”). As set forth in Defendants’ Motion and Memorandum in Support of the Motion, Delta’s voluminous document production in this matter, as well as Mr. Esposito’s deposition testimony, show that Delta has made numerous statements about the NEA that directly rebut Plaintiffs’ theory of the case. As such, Mr. Esposito and Mr. Hauenstein will be crucial witnesses in this trial.

Under the Court’s Local Rules, “[a] party opposing a motion shall file an opposition within 14 days after the motion is served, unless . . . another period is fixed by . . . order of the court.”

Local Rule 7.1(b)(2). Accordingly, Defendants respectfully request that any opposition to the Motion by Plaintiffs or Delta be filed by September 21, 2022 (eight days after they were served with the Motion). Defendants also respectfully request that the Court rule on the Motion by September 27, 2022. Doing so will allow Defendants and Delta sufficient time to arrange for the scheduling and appearance of Mr. Esposito and Mr. Hauenstein at trial in the event the Court grants the Motion.

Dated: September 14, 2022

Respectfully submitted,

/s/ Daniel M. Wall

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), Defendants hereby certify that they have conferred with Plaintiffs and James Denvir of Boies Schiller Flexner LLP, counsel to Delta Air Lines, Inc., regarding the relief requested in this motion. Plaintiffs and Delta do not oppose this motion.

/s/ Daniel M. Wall
Daniel M. Wall

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing. In addition, I hereby certify that a copy of the foregoing document was served by email upon Michael Mitchell and James Denvir of Boies Schiller Flexner LLP, counsel to Delta Air Lines, Inc.

/s/ Daniel M. Wall
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